

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,
Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,
Defendants.

Civil Action No. 2:23-cv-00103-JRG-RSP

UNOPPOSED MOTION FOR ENTRY OF SUPPLEMENTAL PROTECTIVE ORDER

Defendants Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (collectively “Defendants”) move for the Court to enter the Supplemental Protective Order attached as Exhibit A. The Court previously entered a Protective Order to protect Party and Non-Party confidential business information in the above-referenced action on December 1, 2023 (Dkt. No. 65) (“Protective Order”).

Google LLC (“Google”), a non-party to this action, may produce confidential source code and other documents in this action that include or incorporate confidential business information (“CBI”) belonging to Google. The Parties and Google have agreed to provisions in addition to those contained in the Protective Order to protect against misuse or disclosure of such Google CBI.

Therefore, Defendants respectfully request that the Court enter the Supplemental Protective Order attached as Exhibit A.

Dated: September 5, 2024

Respectfully submitted,

/s/ Jon Hyland

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Jon Hyland (Texas Bar No. 24046131)
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*Attorneys for Samsung Electronics America,
Inc. and Samsung Electronics Co., Ltd.*

CERTIFICATE OF CONFERENCE

This is to certify that on September 3, 2024, counsel for Defendants conferred via email with counsel for Plaintiff regarding this motion. During the conference, counsel for Plaintiff stated that this motion was unopposed.

Dated: September 5, 2024

/s/ Jon Hyland

Jon Hyland

CERTIFICATE OF SERVICE

This is to certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on September 5, 2024.

/s/ Jon Hyland

Jon Hyland